

FILED

JUL 12 2018

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEPHEN FULLER,

Defendant.

No.

4:18CR00591 JAR/SPM**INDICTMENT**

The Grand Jury charges that:

Introduction

1. At all relevant times, the Defendant Stephen Fuller was a reservist in the United States Navy ("USN").
2. Between July 13, 2016 and continuing through January 10, 2017, the Defendant was stationed in the Eastern District of Missouri.
3. Between on or about July 13, 2016 and continuing through on or about January 10, 2017, the Defendant sought retirement status and disability benefits from the USN. In doing so, Defendant filed a claim through the United States Department of Defense and the United States Department of Veterans Affairs.
4. As a further part of the process of seeking retirement status and disability benefits, Defendant submitted to evaluation by Physicians and other medical professionals through the USN Physical Evaluation Board (PEB).
5. During his PEB review, the Defendant made numerous false statements relating to his military service. Specifically, the Defendant falsely stated the number, length, and

duration of his deployments. Further, the Defendant fabricated prior injuries and accounts of his prior deployments. In doing so, Defendant sought to receive retirement status and disability benefits by virtue of a diagnosis for Post-Traumatic Stress Disorder (PTSD).

6. Because of Defendant's false statements, Defendant was awarded retirement status and paid in excess of \$50,000 in disability benefits by the USN.

Offense Conduct

Between on or about July 13, 2016 and continuing through on or about January 10, 2017, in the Eastern District of Missouri and elsewhere, the defendant,

STEPHEN FULLER,

did knowingly and intentionally made statements about his military career and his health history which statements were false and material as the defendant well knew to the Physical Evaluation Board of the United States Navy.

All in violation of 18 United States Code Section 1001(a)(2).

A TRUE BILL

FOREPERSON

JEFFREY B. JENSEN
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